

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED]
ORDER TO ALL PLAINTIFFS' COUNSEL
REGARDING RIDE RECEIPT
PRODUCTION**

This Document Relates to:

ALL ACTIONS

WHEREAS, on December 28, 2023, the Court ordered Plaintiffs to produce a bona fide ride receipt from the Uber trip connected to the alleged incident, or the following information: “(1) [an explanation of] why the receipt is unavailable; (2) the name, phone number, and email address of the accountholder who ordered the ride; (3) the date of the ride, with as much precision as is reasonably possible; (4) the starting location and ending location of the ride, with as much precision as is reasonably possible; (5) any other basic information that may assist Defendants in identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or cannot be provided at all, an explanation as to why the information is not readily ascertainable,” by February 15, 2024 or, for cases filed after February 1, 2024, within 14 days of the case being filed in, removed to, or transferred to the MDL. Pretrial Order No. 5, Dkt. No. 175 at 2-3.

WHEREAS, the parties agreed that Plaintiffs shall upload the ride receipts or, in the alternative, the other information requested by the Court in Pretrial Order No. 5 to the MDL

1 Centrality Portal administered by Brown Greer PLC. *See* 1/19/24 Hearing Tr. at 26.

2 **WHEREAS**, the MDL Centrality Portal is now ready for use and all current Plaintiffs’
3 counsel received information about the Portal via email from the Plaintiffs’ Steering Committee
4 on February 2, 2024.

5 **WHEREAS**, the parties agree it would further the interests of the MDL proceedings to
6 enter on the docket a notice to all present and future Plaintiffs’ counsel regarding the MDL
7 Centrality Portal system.

8 **THEREFORE**, the parties respectfully request the Court enter the parties’ stipulation to
9 provide the following information to all present and future Plaintiffs’ counsel:

- 10 • Pursuant to Pretrial Order No. 5, Dkt. No. 175 at 2-3, every Plaintiff must upload a bona
11 fide ride receipt, or the following information: “(1) [an explanation of] why the receipt is
12 unavailable; (2) the name, phone number, and email address of the accountholder who
13 ordered the ride; (3) the date of the ride, with as much precision as is reasonably possible;
14 (4) the starting location and ending location of the ride, with as much precision as is
15 reasonably possible; (5) any other basic information that may assist Defendants in
16 identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or
17 cannot be provided at all, an explanation as to why the information is not readily
18 ascertainable,” which information shall be transmitted via an “Uber Ride Information
19 Form,” within 14 days of the case being filed in, removed to, or transferred to the MDL.
20 If the case was filed in, removed to, or transferred to the MDL on or before February 1,
21 2024, the ride receipt or the other information requested by the Court in Pretrial Order No.
22 5 must be produced by February 15, 2024.
- 23 • Plaintiffs must use the MDL Centrality Portal, administered by Brown Greer PLC, to
24 upload the ride receipt or to fill out the Uber Ride Information Form if no ride receipt is
25 available. Plaintiffs must then produce the receipt or Uber Ride Information Form to Uber
26 through the MDL Centrality Portal.
- 27 • Plaintiffs’ counsel who have already appeared in the MDL should have received an email
28 on January 31, 2024 with an invitation to join the MDL Centrality Portal. All counsel

1 who need to upload ride receipts or submit Uber Ride Information Forms can request
2 access to the portal by emailing MDL Centrality at Uber@browngreer.com. There is no
3 charge for accounts, and each person using the Portal should have their own account.

- 4 • Technical questions about the MDL Centrality Portal can be directed to
5 Uber@browngreer.com. Other questions about ride receipt or Uber Ride Information
6 Form production can be directed to Plaintiffs' Steering Committee members Sara Peters
7 (speters@walkuplawoffice.com) and Meredith Stratigopoulos
8 (mdrukker@wattsguerra.com).

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10 **IT IS SO STIPULATED.**
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1 Dated: February 8, 2024

Respectfully submitted,

2 By: /s/ Sarah R. London

3 Sarah R. London (SBN
4 267083)

5 **LIEFF CABRASER HEIMANN &
6 BERNSTEIN, LLP**

7 275 Battery Street, 29th Floor
8 San Francisco, CA 94111-3339
9 Telephone: (415) 956-1000
10 Facsimile: (415) 956-1008
11 slondon@lchb.com

12 By: /s/ Rachel B. Abrams

13 Rachel B. Abrams (SBN
14 209316)

15 **PEIFFER WOLF CARR KANE
16 CONWAY & WISE, LLP**

17 555 Montgomery Street, Suite 820
18 San Francisco, CA 94111
19 Telephone: (415) 426-5641
20 Facsimile: (415) 840-9435
21 rabrams@peifferwolf.com

22 By: /s/ Roopal P. Luhana

23 Roopal P. Luhana

24 **CHAFFIN LUHANA LLP**

25 600 Third Avenue, 12th Floor
26 New York, NY 10016
27 Telephone: (888) 480-1123
28 Facsimile: (888) 499-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

1
2 Dated: February 8, 2024

By: /s/ Robert Atkins

Robert Atkins

3
4 **PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

By: /s/ Robert Atkins

ROBERT ATKINS

RANDALL S. LUSKEY

KYLE N. SMITH

JESSICA E. PHILLIPS

CAITLIN E. GRUSAUSKAS

ANDREA M. KELLER

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

Attorneys for Defendants

UBER TECHNOLOGIES, INC.,

RASIER, LLC, and RASIER-CA,

LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**[PROPOSED] ORDER TO ALL
PLAINTIFFS' COUNSEL REGARDING
RIDE RECEIPT PRODUCTION**

This Document Relates to:

ALL ACTIONS

The Court hereby GRANTS the parties' stipulation as follows:

1. Pursuant to Pretrial Order No. 5, Dkt. No. 175 at 2-3, every Plaintiff must upload a bona fide ride receipt, or the following information: "(1) [an explanation of] why the receipt is unavailable; (2) the name, phone number, and email address of the accountholder who ordered the ride; (3) the date of the ride, with as much precision as is reasonably possible; (4) the starting location and ending location of the ride, with as much precision as is reasonably possible; (5) any other basic information that may assist Defendants in identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or cannot be provided at all, an explanation as to why the information is not readily ascertainable," which information shall be transmitted via an "Uber Ride Information Form," within 14 days of the case being filed in, removed to, or transferred to the MDL. If the case was filed in, removed to, or transferred to the MDL on or before February 1, 2024, the ride receipt or the other information requested by the Court in Pretrial Order No. 5 must be produced by February 15, 2024.

2. Plaintiffs shall use the MDL Centrality Portal, administered by Brown Greer PLC, to

1 upload the ride receipt or to fill out the Uber Ride Information Form if no ride receipt is available.
2 Plaintiffs shall then produce the receipt or Uber Ride Information Form to Uber through the MDL
3 Centrality Portal.

4 3. Plaintiffs' counsel who have already appeared in the MDL should have received an
5 email on January 31, 2024 with an invitation to join the MDL Centrality Portal. All counsel who
6 need to upload ride receipts or submit Uber Ride Information Forms can request access to the
7 portal by emailing MDL Centrality at Uber@browngreer.com. There is no charge for accounts,
8 and each person using the Portal should have their own account.

9 5. Technical questions about the MDL Centrality Portal can be directed to
10 Uber@browngreer.com. Other questions about ride receipt or Uber Ride Information Form
11 production can be directed to Plaintiffs' Steering Committee members Sara Peters
12 (speters@walkuplawoffice.com) and Meredith Stratigopoulos (mdrukker@wattsguerra.com).
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14 **IT IS SO ORDERED.**

15 Date: _____, 2024

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17 HON. LISA J. CISNEROS
18 UNITED STATES MAGISTRATE JUDGE
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